

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF KANSAS**

SAMUEL K. LIPARI,)	
)	
)	Plaintiff,
)	
vs.)	Case No. 07-CV-02146-CM-DJW
)	
U.S. BANCORP, and)	
)	
U.S. BANK NATIONAL ASSOCIATION,)	
)	
)	
Defendants.)	

DEFENDANTS’ MOTION FOR PROTECTIVE ORDER

Defendants, by and through their attorneys Shughart, Thomson & Kilroy file this Motion for Protective Order pursuant to Fed. R. Civ. P. 26(c). In support of this Motion, defendants state as follows:

1. On February 13, 2008, plaintiff served his First Requests for Production on defendants. *See*, Certificate of Service, Doc. No. 53.
2. The requests are facially overly broad in that they seek “all documents related to...” a wide variety of subjects that have little or no relevance to the claims or defenses at issue in this lawsuit.
3. Requiring defendants to comply with these requests would place an undue burden and expense on the defendants given that the amount of information requested and the information’s relevance (or lack thereof) to the issues in dispute.
4. Fed. R. Civ. P. 26(c) provides that the court may enter a protective order “to protect a party or person from annoyance, embarrassment, oppression, or undue burden or expense...” Defendants request such an order in relation to plaintiff’s discovery.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing document was filed electronically with the above-captioned court, with notice of case activity to be generated and sent electronically by the Clerk of said court this 17th day of March, 2008, to:

Mr. Samuel K. Lipari
297 NE Bayview
Lee's Summit, MO 64064

/s/ Jay E. Heidrick _____
Attorney for Defendants